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**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: *Telephone Number Portability, et al*, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116

Dear Ms. Dortch:

On March 14, 2018, William Reidway, Vice President of Product Management, of Neustar, Inc. ("Neustar"), and Gregg Elias and the undersigned of Wiley Rein LLP met with Nick Degani and Nirali Patel of Chairman Pai's office and Eric Burger, the Federal Communications Commission's Chief Technology Officer. The purpose of this meeting was specifically to discuss why any contingency rollback to Neustar's Number Portability Administration Center ("NPAC") would be consumer disruptive if the cutover occurs on April 8, 2018.

Neustar first described the difference between "failback" and "rollback" scenarios. In the former, the successor NPAC has not yet started receiving or processing requests. In the latter, the successor NPAC has received or processed requests from NPAC users, which results in a loss of data authority inside the Neustar NPAC. Neustar explained that a non-automated approach to rollback is operationally infeasible because of complexity when gathering, sequencing, and restoring NPAC data between the authoritative database, carriers' ordering platforms, and service provider networks for the purpose of call and text routing.

Neustar further explained that the viability of any rollback plan should be evaluated based on its ability to quickly restore optimum functionality and avoid consumer disruption under real-world conditions rather than the artificially low volumes hypothesized by some half-hearted, voluntary industry commitments. Were the entire Southeast region of the NPAC to attempt a manual data resubmission using procedures untested under real-world conditions, Neustar is confident that the effort would be prohibitively expensive, time-consuming, and error prone. Most importantly, Neustar explained the mechanisms by which consumers across the industry would be affected by a failed or delayed rollback scenario, independent of the actions of individual service providers.



Marlene H. Dortch

March 16, 2018

Page 2

Neustar reaffirmed its position that any rollback plan should consider porting volume greater than those produced in an artificially constrained twenty-four hour window. Consistent with its earlier filings, Neustar explained that a wide variety of fatal performance and data management issues can manifest well after the first day of operation. Any plan to reduce NPAC operations and functions to artificially small volumes during the rollback window only increases the risk that critical problems will become visible after the limited rollback window has passed.

Neustar reaffirmed that an automated solution is the only way to avoid wide-scale consumer disruption when the Southeast Region cuts over. To adopt any rollback approach without validation and testing at real-world scale is careless and only gives a false and inappropriate sense of security to the industry and consumers.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "T. Navin", written over the typed name and title.

Thomas J. Navin  
*Counsel to Neustar, Inc.*

cc: Nicholas Degani  
Nirali Patel  
Eric Burger